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March 11, 2002

Docket Management Facility (USCG-2001-10163) - 88

US Department of Transportation, room PL-401

400 Seventh St. SW

Washington DC 20590-0001

RE: Notice of Proposed Rulemaking for Federal Requirements for Propeller
Avoidance Measures: (66 Fed. Reg. 237, December 10, 2001)

Dear Sir / Madam:

The National Marine Manufacturers Association (NMMA) and the Houseboat Industry Association (HIA) are offering the following comments with regard to the Notice of Proposed Rulemaking for Federal Requirements for Propeller Avoidance Measures (66 Fed. Reg. 237, December 10, 2001)

The NMMA, with over 1400 members, is the leading trade association of US recreational boat, marine engine, and marine accessory manufacturers. NMMA members include small, medium, and large businesses. The HIA, with 25 members, is an association, which focuses specifically on issues effecting the houseboat industry.

Executive Committee	Chairman, NMMA Jack Malone Yamaha Marine Group	Vice Chairman, NMMA William Barrington Sea Ray Boat Group	Secretary, NMMA J. Marty O'Donohue MARINCO	Treasurer, NMMA Kris Carroll Grady-White Boats	Immediate Past Chairman, NMMA Gayle McClure Dutton-Lainson Co.
	Chairman, NABM David Slikkers Tiara Yachts	Chairman, AMEM Tom Fileman Flagship Marine Engine Co.	Chairman, NAMPS Robert Selig, Jr. Davis Instruments	President, NMMA Thomas J. Dammrich	

Together, making boating the #1 choice in recreation.

NMMA and HIA have five major concerns with the US Coast Guard (USCG) proposal:

- Current USCG accident statistics do not support the “need” for these requirements, nor are there any indications of a trend towards increased propeller accidents on houseboats.
- NMMA and HIA challenge the US Coast Guard’s proposed solutions for reducing propeller injuries. NMMA and HIA’s position is that USCG documentation has not supported the need or the benefit of this proposal. The USCG has stated that its accident statistics may be understated. NMMA and HIA can only base our comments on the USCG accident data. If the USCG is challenging its own data and has other data that it believes supports this rule, that data needs to be included in the docket. If such data is produced, NMMA and HIA would request that this rule be re-proposed with the revised data, so that we have sufficient time to analyze the new information and reevaluate our comments.
- NMMA and HIA data, supplied by our members, challenges the \$300 USCG estimated cost for the three combined measures: swim ladder interlocks, clear visibility aft device, and ignition cutoff switch.
- NMMA and HIA members, including houseboat owners, rental operators and manufacturers, challenge the measurable “ safety benefit” that the USCG proposed devices will actually provide.
- Many houseboat rental operations are defined as small businesses under the federal definition of less than 500 employees. It is the position of the NMMA and HIA that the USCG did not properly identify the real costs and failed to evaluate the significant impact that this rule will have on small businesses. NMMA and HIA believe that the underestimated cost for technology is a direct

result of the USCG's failure to comply with the Federal SBREFA requirements.

1. Benefits of the Rule

Current USCG accident statistics do not support the "need" for these requirements, nor are there any indications of a trend towards increased propeller accidents on houseboats.

NMMA and HIA support this position based on the USCG boating accident data for the ten-year period from 1991-2000 for houseboats. For the purpose of examining trends in propeller accidents, we have split the data into two sets, the first for accidents between 1991-1995 and the second between 1996 and 2000.

For rental houseboat accidents for the first five years between 1991 and 1995 the USCG reported three inboard propeller injuries, three outboard propeller/ gear case injuries, six stern drive propeller / gear case injuries, of which two of these injuries resulted in a fatality. For rental houseboats for the second five years between 1996 and 2000 there were no inboard propeller injuries, one outboard propeller / gear case injury, and no stern drive propeller / gear case injuries. This clearly represents a trend in the reduction of propeller related accidents on rental houseboats.

For all houseboat accidents for the first five years between 1991 and 1995 the USCG reported three inboard propeller injuries, five outboard propellers / gear case injuries and eleven stern drive propeller / gear case injuries, including the two previously cited fatalities. For all houseboats for the second five years between 1996 and 2000 the USCG reported one inboard propeller injury, two outboard propeller / gear case injuries and three stern drive propeller / gear case injuries.

The USCG defines a reportable injury as one requiring medical treatment beyond first aid. In regards to propeller injuries, one would assume that there would not be many minor injuries that would go unreported. Being hit by a propeller, spinning at any speed, would logically result in a major event requiring some form of professional medical attention, beyond first aid. This type of event would be reported. With no fatalities reported since 1996, and a clearly evident trend towards a reduction in accidents and injuries, NMMA and HIA challenge the USCG to provide data that supports the need for this rule. NMMA and HIA attribute the trend in reduction in accidents and total elimination of fatalities to increased education and awareness. With the manufacturers and rental operations providing both customer training and labeling of hazard points, propeller accidents have been reduced and fatalities virtually eliminated. NMMA and HIA challenge the USCG's justification for proposing to require design based technologies, at a significant cost, when the data clearly shows that awareness training and labeling are the solution.

2. Legal and Regulatory Policy Issues

- *USCG Must Weigh the Economic Considerations and Performance Consequences*

The marine industry is uniquely susceptible to variations in cost, especially when regulation results in an increase in costs. For example, in 1990, the federal government imposed a 10% luxury tax on recreational boats costing over \$100,000. Between 1990 and 1992, the addition of this tax combined with a recession caused an 80% decline in the sale of boats subject to the tax and in a loss of approximately 25,000 jobs. This tax nearly put this segment of the boating industry out of business. The USCG must assure that these rules do not lead to this type of adverse consequence. The USCG cost estimates, which will be discussed in a later section, significantly underestimate the cost of this rule.

The Regulatory Flexibility Act (RFA) as amended by the Small Business Regulatory Enforcement Fairness Act of 1996 (SBREFA) requires the USCG to prepare an analysis (meeting specific criteria) of any rule subject to notice and comment rulemaking requirements under the Administrative Procedure Act unless the agency certifies that the rule will not have a significant economic impact on a substantial number of small entities. The actual cost burden of this rule clearly falls within the parameters of SBREFA review requirements. However, the USCG simply concludes that it has determined that this action will not have a significant adverse impact on a substantial number of small entities. The basis for this conclusion is an unsupported, underestimated cost analysis. To the contrary, these comments will demonstrate that there may be a significant adverse impact on regulated entities. As a result, NMMA urges USCG to conduct a SBREFA review as required to assess the impacts of this proposed regulation on small entities.

NMMA and HIA believes that the USCG has failed to comply with the provisions under Executive Order # 12866, which states that agencies should "...select the approaches that maximize the net benefits..." Section 1(a). In this rulemaking process the USCG has only identified a handful of designed based technologies and applied costs. The USCG has failed to establish an individual benefit to applying these design based technologies or compare the benefit and cost of these technologies to the benefits and costs of increased training and safety awareness. Increased training and safety awareness is clearly supported by the trends in the USCG boating accident data.

NMMA and HIA also believe that the USCG has failed to follow the required procedures in 46 USC Chapter 43 (Boating Safety Act for Recreational Vessels).

Specifically the law requires that the need for and extent to which the regulations will contribute to recreational vessel safety be considered, and that

relevant available recreational vessel safety standards, statistics and data, including public and private research, development, testing, and evaluation be considered.

- NMMA and HIA challenge that the statistics support the need for the rule.
- NMMA and HIA believe that the extent of effectiveness of the proposed interventions has not been thoroughly researched, tested and evaluated. The 1997 and 1998 Marine Technical Society reports approved by the Chief of Boating Safety are not valid for rulemaking, because they express the views of the authors and did not establish real-life feasibility or effectiveness.
- NMMA and HIA are of the understanding that industry safety standards for the proposed design based technologies do not exist nor has the USCG developed a level of performance against which the proposed interventions can be measured.

46 USC § 4302 states that a regulation can not compel substantial alteration of a recreational vessel or item of associated equipment that are in existence.

46 USC § 4302 may require compliance or performance to avoid a substantial risk of personal injury to the public. Without a “substantial risk” established, the alterations of an existing vessel prescribed by this proposed rule are prohibited.

- NMMA and HIA believe that a substantial risk has not been identified if it is being supported by USCG accident data.
- NMMA and HIA consider the proposed design based technologies to constitute “substantial alteration” with regard to the addition or modification of the vessel or associated equipment. NMMA and HIA challenge the USCG cost estimates and its failure to consider the challenges that existing

houseboat owners will face making these modifications without the vessel and engine manufacturers approval, engineering or guidance.

NMMA and HIA will expand on the technical and economic feasibility, along with the actual safety benefits of the proposed designed based technologies in the following sections.

3. USCG Proposed Designed- Based Technologies

The USCG proposal requires owners of non-planing houseboats with propeller-driven propulsion, located aft of the transom, to install one of two propulsion unit measures or measures that employ three combined measures.

The proposal requires owners who lease, rent, or charter non-planing recreational houseboats to install either a jet drive system, propeller guards or three combined measures. The three combined measures include installing swim ladder interlocks, a clear visibility aft device, and an ignition cut-off switch. Owners of non-planing, non-rental houseboats would be required to install the interlocks and the clear visibility aft device, but not the ignition cutoff switch.

NMMA and HIA could consider supporting these technologies or a combination of these technologies if the USCG had data to support the benefit. The USCG provides relief for owners of non-planing non-rental houseboats from having to install an ignition cut off switch. Why not allow them to choose from two of the three technologies? Why not one of the three? Why not none of the three? Why does the ignition cut off switch provide less protection than the clear visibility aft device and the swim ladder interlocks. How much protection? NMMA and HIA can not support a rule where the benefits of the proposed technology can not be quantified. In order to support this rule, NMMA and HIA would need to see data

that shows the additional accidents that will be prevented by applying these technologies.

NMMA and HIA also have concerns with the proper application of these technologies for which recognized standards do not exist. For example: the clear visibility aft device. What constitutes an acceptable design or placement? Even though it is being required, the USCG understands that a mirror does not exist where you can see the propeller or gear case or even the adjacent area from the helm. Without a standard, the location of the mirror will be inconsistent and arbitrary creating a false sense of protection and perhaps an increased risk. It also raises an enforcement question. Is the mirror in compliance or not?

4. Proposed Cost of Design Based Technologies.

When evaluating the benefit of this rule in an attempt to find justification it leads us to the inevitable challenge of the cost of the proposal. The USCG states that "...the maximum cost is based on installation of a propeller guard which we estimate to be \$300.00 (self installed)." The USCG estimates the cost of the "swim ladder interlock" to be \$100.00 (plus installation costs), a "clear visibility aft device" to be \$20.00 (self-installed), and an "ignition cutoff switch" to cost \$40.00 (plus installation).

NMMA and HIA have worked closely with the houseboat industry to collect information on the cost of these design-based technologies. Based on data collected from a number of suppliers, the USCG costs are seriously underestimated.

- *Propeller Guards*

The cost of propeller guards retrofitted onto a 61- ft. Somerset rental houseboat (monohull) powered by two 115 hp Mercury outboard engines. Costs

based on Swim Guard propeller guard by MariTech Industries (formerly Propeller Safety Technologies)

Propeller Guards	\$333.50 x 2 =	\$667.00
Labor per hour	\$69.00 x 1 =	\$69.00
Haul & Launch	\$976.00 x 1 =	\$976.00 (\$16 per ft @ 61 ft)
Total	=	\$1712.00
<u>USCG Estimate</u>	=	<u>\$300</u>
Difference	=	\$1412

- *Swim Ladder Interlock Device*

The cost of a swim ladder interlock device retrofitted onto a 61-ft. Sumerset rental houseboat (monohull) powered by two 115 hp Mercury outboard engines. Cost based on Marine Safety System (formerly the Swimmer Safety System) by MariTech Industries (formerly Propeller Technologies)

Swim Ladder	68.60 x 2 =	\$137.20
Labor per hour	69.00 x 3 =	\$ 207.00
Haul & Launch	\$976.00 =	\$ 976.00 (\$16 per ft @ 61 ft.)
Total		\$ 1320.20
<u>USCG Estimate</u>		<u>\$ 100.00</u>
Difference		\$ 1220.20

- *Ignition Cut-off Switch*

The cost of an ignition cut-off switch retrofitted onto a 61-ft Sumerset rental houseboat powered by two 115 hp Mercury outboard engines with upper

and lower helm stations. Cost based on Mercury part number 87-814324B2 dual engine kill switch.

Cut-off Switch	66.75 x 2 =	\$ 133.50
<u>Labor per hour</u>	<u>69.00 x 2 =</u>	<u>\$ 138.00</u>
Total		\$ 271.50
<u>USCG Estimate</u>		<u>\$ 40.00</u>
Difference		\$ 231.50

- *Clear Visibility Aft Device*

The cost of the clear visibility aft device includes pricing from a variety of convex style safety mirrors similar to the 7" x 9' USCG proposed size. For a comparison of the cost difference we took the average cost of the four prices and compared it to the USCG estimate. These costs may be underestimated because they consider self- installation, which for many houseboat owners and rental operators would not be an option. The rental operator could not avoid incurring a labor charge.

WW Grainger, Inc. #1M802- 12"x18" convex safety mirror	\$64.35
WW Grainger, Inc. #1 M800-18"x 26" convex safety mirror	\$109.60
WW Grainger, Inc. # 6AR72- 12" convex safety mirror	\$41.70
<u>WW Grainger, Inc. # 2BC95- 18" convex safety mirror</u>	<u>\$55.25</u>
Average Cost	\$67.72
<u>USCG Estimate</u>	<u>\$20.00</u>
Average Difference	\$47.72

NMMA and HIA estimates of the total cost of implementing the three proposed propeller injury avoidance measures to be \$3303.70 per houseboat. The actual number may be higher because it does not include the installation cost for the clear visibility aft device. When compared to the USCG estimated cost of \$440.00 for these three technologies, it is clearly evident that the USCG has underestimated the actual cost of this rule by over \$2800 dollars.

5. Proposed Definitions

The USCG has proposed language for definitions of the terms: clear vision aft, houseboat, ignition cut-off switch, non-planing vessel, and swim platform interlock.

NMMA and HIA support the USCG's efforts to propose definitions for various types of vessels. Many federal and state regulatory agencies look to the USCG definitions to be able to segregate categories of recreational boats for rulemaking. The current definitions in the US Code are not suitable for categorizing different types of recreational boats. NMMA and HIA's concern will be that the definitions are clear and precise, so as to improve the rulemaking process and not cause confusion. NMMA and HIA propose that the USCG meet with us to develop an industry consensus prior too moving forward with a final rule.

NMMA and HIA have reviewed the proposed definitions and offer these revisions.

Houseboat- a motorized vessel designed primarily with accommodation spaces with little or no fore deck or cockpit, with low freeboard and with low length to beam ratio.

Comment: Houseboats have high length to beam ratios. A typical

houseboat would be about 50 feet long and 10 feet beam for a length to beam ratio of $50/10 = 5$. A typical planning boat has a length to beam ratio of about 3 to 4.

Clear vision aft device – means a device, such as a video camera and monitor or a mirror, that allows the operator to see aft of the vessel from the engine throttle control station to be aware of the presence of a swimmer near the propeller.

Comment: As mentioned in the previous comments, NMMA and HIA have serious concerns with this technology. The USCG definition "to be aware of" highlights the false sense of security that could be realized by a captain assuming that all is clear. The correct language would be "...that allows the operator to see aft of the vessel from the engine throttle control station to see a swimmer near the propeller." The only technology that we recognize to perform this task is a knowledgeable boater who makes sure that the crew and passengers are accounted for and all is clear prior to operating the boat.

Ignition cut-off switch- means a device that interrupts the engine ignition to stop the engine when the operator moves away from the engine *throttle / shift* control station.

Non-planing vessel- means a vessel with a hull that is designed to ride through

the water at any speed.

"means a vessel with a hull that remains in the displacement mode throughout its speed range."

Planing vessel- means a vessel with a hull that is designed to ride on top of the water beyond a minimum point.

"means a vessel with a hull that is designed to be supported by hydrodynamic lift forces when operated beyond the displacement speed range."

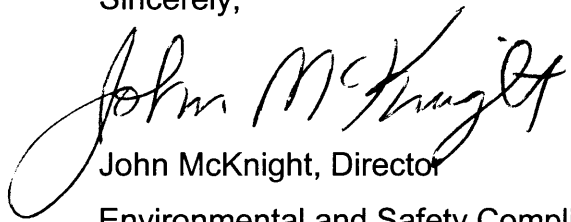
Boarding ladder interlock- means a device that interrupts the engine ignition to stop the engine when a swim ladder is *deployed* into *boarding* position *at or* near the *boat transom*.

Conclusion

The NMMA and HIA believe that this USCG proposed regulation is at best a solution in search of a problem. The USCG's own data does not support the cost and the proposed technology has the potential of creating a false sense of security. The most effective method for reducing the risk of injury from recreational boats, regardless of the hazard, is to increase education for boating safety. The USCG's own statistics from 1996-2000 support this as the solution.

Thank you for the opportunity to comment on this important proposal. If you have any questions or comments, please feel free to contact me at 202-721-1604.

Sincerely,

A handwritten signature in black ink, reading "John McKnight". The signature is fluid and cursive, with a large loop at the beginning and a stylized "H" at the end.

John McKnight, Director

Environmental and Safety Compliance

APPENDIX A

Houseboat Propeller Accident Data

1990 - 1998

PAGE 1.1

House boats (rental)

RENTAL

ZBARPTIA

STRUCK BY BOAT OR PROPELLER

02/22/02

BOAT RENTAL

LIST	ACC_YEAR	ACC_MMDD	ACC_TIME	HULL_ID	ENGINE	BOAT_TYPE	BOAT_YEAR	HP	LENGTH	AGE	POB	BOAT_MANU	HULL_MAT
1	1991	08/24	14		INBOARD/OUTBOARD	HOUSEBOAT	80	999	50	32	8	HLR	STEEL (METAL)
2	1992	05/07	99		INBOARD/OUTBOARD	HOUSEBOAT	99	120	47	22	99	UUU	STEEL (METAL)
3	1992	05/31	15		OUTBOARD	HOUSEBOAT	99	999	50	24	12	MBC	STEEL (METAL)
4	1992	09/03	11		OUTBOARD	HOUSEBOAT	99	120	54	31	10	MRT	ALUMINUM
5	1992	09/06	17		INBOARD/GASOLINE	HOUSEBOAT	82	200	50	25	10	UUU	STEEL (METAL)
6	1993	03/21	16		INBOARD/OUTBOARD	HOUSEBOAT	87	140	52	22	99	ZZB	ALUMINUM
7	1993	08/06	15		OUTBOARD	HOUSEBOAT	81	40	24	15	99	UUU	ALUMINUM
8	1993	09/04	20		INBOARD/OUTBOARD	HOUSEBOAT	91	999	56	18	6	RHR	ALUMINUM
9	1994	07/14	17		INBOARD/OUTBOARD	HOUSEBOAT	93	260	56	51	99	FCX	ALUMINUM
10	1994	05/29	15		INBOARD/GASOLINE	HOUSEBOAT	91	260	56	99	2	FLX	STEEL (METAL)
11	1994	09/18	15		OUTBOARD	HOUSEBOAT	82	999	46	26	11	HLR	STEEL (METAL)
12	1995	07/19	14:00:00	RHR01055E000	INBOARD/STERN DRIVE	HOUSEBOAT	1988		50		9	LEISURE CRAFT	ALUMINUM
13	1995	07/21	17:59:00	ZZB3B044A787	INBOARD/STERN DRIVE	HOUSEBOAT	1987		52	30	15	SUNSEEKER	ALUMINUM
14	1995	08/21	17:20:00	FCX000096191	INBOARD	HOUSEBOAT	1991	260	55		8	FUN COUNTRY MARINE INDUSTRIES	ALUMINUM
15	1996	06/09	17:00:00	KAY09563M83C	OUTBOARD	HOUSEBOAT	1983		50	49	4	KAYOT	ALUMINUM
16	1998	05/06	11:20:00	FCX001126595	INBOARD/STERN DRIVE	HOUSEBOAT	1995	260	56		3	FUNCOUNTRY	ALUMINUM
17	1998	07/20	17:30:00	1023M88L	OUTBOARD	HOUSEBOAT	1988		36	42	3	BTLOP	STEEL

TOTAL

02/22/02

[illegible]

ACC_TYPE2		ACC_TYPE3	CASE_NBR	BOAT_ID
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JECT	STRUCK BY BOAT		199145069	A
			19925074	A
			19925192	A
			19925369	A
			19925513	A
	STRUCK BY PROPELLER/ENGINE		19933272	A
			19935366	A
			19935430	A
			19943125	A
			199434173	A
JECT	STRUCK BY BOAT OR PROPELLER		19945483	A
			199505292	B
			199505806	A
			199534221	A
			199653110	A
	STRUCK BY PROPELLER/ENGINE		199834010	A
			199853062	A
JECT	STRUCK BY BOAT			
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PAGE 1.1

RENTAL

ZBARPTIC
STRUCK BY BOAT OR PROPELLER
BOAT RENTAL

02/22/02

LIST CAUSE1	CAUSE2	CAUSE3	CAUSE_OTHER	ACC_DESC1
1 OTHER				SWIMMER OR DIVER INVOLV
2 NO PROPER LOOKOUT				SWIMMER OR DIVER INVOLV
3 NO PROPER LOOKOUT	INEXPERIENCE OF OPERATOR			STRUCK BY PROPELLER
4 ENGINE FAILURE	OTHER VESSEL/OPERATOR AT FAULT	STRONG CURRENT, ROUGH WATERS, WEATHER, ETC.		STRUCK BY BOAT
5 NO PROPER LOOKOUT	INEXPERIENCE OF OPERATOR			STRUCK BY PROPELLER
6 OPERATOR INATTENTION OR CARELESSNESS	0			ALCOHOL INVOLVED
7 SITTING ON GUNNEL, TRANSOM, BOW, ETC.	0			STRUCK BY PROPELLER
8 OTHER	0			STRUCK BY PROPELLER
9 FALLS WHILE MOVING, STANDING, OR LEANING OVER OTHER				HELP WAS NEARBY
10 OTHER				OPERATOR DID NOT CONTRI
11 NO PROPER LOOKOUT	OPERATOR INATTENTION OR CARELESSNESS	OTHER		SWIMMER OR DIVER INVOLV
12 OPERATOR INEXPERIENCE			HIGH IDLE	
13 OPERATOR INATTENTION	NO PROPER LOOKOUT	ALCOHOL USE		
14 WEATHER	NO PROPER LOOKOUT	OPERATOR INEXPERIENCE	NO ONE AT CONTROLS	
15 NO PROPER LOOKOUT				
16 PASSENGER/SKIER BEHAVIOR			DESIGN OF SWIM LADDER ATTACHME	NONE
17 PASSENGER/SKIER BEHAVIOR				

TOTAL

	ACC_DESC2	ACC_DESC3	ACC_DESC4
	-----	-----	-----
ED	STRUCK BY PROPELLER	OPERATOR DID NOT CONTRIBUTE TO FAULT	
ED	STRUCK BY PROPELLER	OPERATOR CONTRIBUTED TO FAULT	
	OPERATOR CONTRIBUTED TO FAULT		
	OPERATOR DID NOT CONTRIBUTE TO FAULT		
	OPERATOR CONTRIBUTED TO FAULT		
	SWIMMER OR DIVER INVOLVED	STRUCK BY PROPELLER	OPERATOR DID NOT CONTRIBUTE TO FAULT
	OPERATOR CONTRIBUTED TO FAULT	0	
	OPERATOR DID NOT CONTRIBUTE TO FAULT	0	
	OPERATOR DID NOT CONTRIBUTE TO FAULT		
BUTE TO FAULT			
ED	STRUCK BY PROPELLER	OPERATOR CONTRIBUTED TO FAULT	

02/22/02

Houseboats (all)

ALL

LIST	ACC_YEAR	ACC_MHMD	ACC_TIME	HULL_ID	ENGINE	BOAT_TYPE	BOAT_YEAR	HP	LENGTH	AGE	POB	BOAT_MANU	HULL_MAT
1	1991	08/24	14		INBOARD/OUTBOARD	HOUSEBOAT	60	999	50	32	6	HJR	STEEL (METAL)
2	1992	08/01	18		OUTBOARD	HOUSEBOAT	68	70	20	33	7	BUJ	ALUMINUM
3	1992	05/07	99		INBOARD/OUTBOARD	HOUSEBOAT	99	120	47	22	99	UUU	STEEL (METAL)
4	1992	05/31	15		OUTBOARD	HOUSEBOAT	99	999	50	24	12	MBC	STEEL (METAL)
5	1992	09/03	11		OUTBOARD	HOUSEBOAT	99	120	54	31	10	MRT	ALUMINUM
6	1992	09/06	17		INBOARD/GASOL INE	HOUSEBOAT	62	200	50	25	10	UUU	STEEL (METAL)
7	1992	06/22	18		INBOARD/OUTBOARD	HOUSEBOAT	99	999	56	19	6	UUU	ALUMINUM
8	1993	06/13	17		INBOARD/OUTBOARD	HOUSEBOAT	73	225	37	61	2	DCL	FIBERGLASS
9	1993	08/16	18		INBOARD/OUTBOARD	HOUSEBOAT	67	185	54	62	10	CPV	STEEL (METAL)
10	1993	03/21	16		INBOARD/OUTBOARD	HOUSEBOAT	67	140	52	22	99	ZZB	STEEL (METAL)
11	1993	07/10	10		UNKNOWN	HOUSEBOAT	99	999	99	99	99	UUU	UNKNOWN
12	1993	08/06	15		OUTBOARD	HOUSEBOAT	81	40	24	15	99	UUU	ALUMINUM
13	1993	09/04	20		INBOARD/OUTBOARD	HOUSEBOAT	91	999	56	18	6	RHR	ALUMINUM
14	1993	07/04	18		INBOARD/OUTBOARD	HOUSEBOAT	99	999	99	99	99	UUU	ALUMINUM
15	1994	07/14	17		INBOARD/OUTBOARD	HOUSEBOAT	93	260	56	51	99	FCX	ALUMINUM
16	1994	05/29	15		INBOARD/GASOL INE	HOUSEBOAT	91	260	56	99	2	FLX	STEEL (METAL)
17	1994	09/18	15		OUTBOARD	HOUSEBOAT	62	999	46	26	11	HJR	STEEL (METAL)
18	1995	07/19	14:00:00	RHR01055688	INBOARD/STERN DRIVE	HOUSEBOAT	1988		50		9	LEISURE CRAFT	ALUMINUM
19	1995	07/25	11:00:00		UNKNOWN	HOUSEBOAT	UNK		UNKNOWN				UNKNOWN
20	1995	07/21	17:59:00	Z2B3B04A787	INBOARD/STERN DRIVE	HOUSEBOAT	1987		52	30	15	SUNSEEKER	ALUMINUM
21	1995	06/11	16:00:00	TKZ00695B595	OUTBOARD	HOUSEBOAT	1995	500	78	51	5	STARDUST CRUISERS	ALUMINUM
22	1995	08/21	17:20:00	FCX000094191	INBOARD	HOUSEBOAT	1991	260	55	48	8	FUN COUNTRY MARINE INDUSTRIES	ALUMINUM
23	1995	10/08	14:15:00	OUUE20721869	OUTBOARD	HOUSEBOAT	UNK	115	20	46	4	AQUASPORT MARINE IND	FIBERGLASS
24	1995	06/17	10:30:00	360500178	INBOARD	HOUSEBOAT	1978	140	50	43	1	KAYOT	STEEL
25	1995	06/17	10:30:00	HMH 00566 M83J	INBOARD/STERN DRIVE	HOUSEBOAT	1983	35	35	58	0	HOLIDAY MANSTON	FIBERGLASS
26	1996	07/13	13:00:00	UNK.	INBOARD/STERN DRIVE	HOUSEBOAT	1974	165	50	50	5	MASTER FABRICATORS	STEEL
27	1996	08/04	0:15:00	GBN5017M80A	INBOARD	HOUSEBOAT	1980	770	50	46	13	GIBSON FIBERGLASS PRODS INC.	FIBERGLASS
28	1996	05/18	14:45:00		OUTBOARD	HOUSEBOAT	1983	50	35	26	6	GANANOQUE	STEEL
29	1996	06/09	17:00:00	KAY09563M83C	OUTBOARD	HOUSEBOAT	1985		50	49	4	KAYOT	ALUMINUM
30	1998	11/26	16:00:00	ARB593LTH495	INBOARD/STERN DRIVE	HOUSEBOAT	1996	140	46	50	5	CATAMARAN CRUISERS	FIBERGLASS
31	1998	02/05	14:45:00	22833256K788	OUTBOARD	HOUSEBOAT	1988	260	56	50	2	3 BUOYS'S	ALUMINUM
32	1998	07/18	16:00:00		OUTBOARD	HOUSEBOAT	1974	85	35	50	2	CREST	ALUMINUM
33	1998	08/01	13:00:00	NAT485030873	INBOARD	HOUSEBOAT	1974	520	48	40	1	NAUTAL INE	FIBERGLASS
34	1998	05/06	11:20:00	FCX00112G595	INBOARD/STERN DRIVE	HOUSEBOAT	1995	260	56	3	3	FUNCOUNTRY	ALUMINUM
35	1998	09/07	15:00:00	HGV03303D797	OUTBOARD	HOUSEBOAT	1997	500	61	64	2	LAKEVIEW	ALUMINUM
36	1998	07/20	17:30:00	1023M88L	OUTBOARD	HOUSEBOAT	1988	36	36	42	3	BILOP	STEEL
37	1999	06/15		HMH00384M80F	INBOARD	HOUSEBOAT	1980		36		0	HOLIDAY MANSTON	ALUMINUM
38	1999	07/03	16:00:00		INBOARD/STERN DRIVE	HOUSEBOAT	UNK	110	52		0		STEEL
39	1999	12/11	16:00:00		INBOARD/STERN DRIVE	HOUSEBOAT	UNK		36	32	8	AQUA CHALLET	ALUMINUM
40	1999	05/23	18:56:00		INBOARD/STERN DRIVE	HOUSEBOAT	UNK		60		0		UNKNOWN
41	1999	05/29	17:00:00		INBOARD	HOUSEBOAT	1991	500	27	45	3	FOUNTAIN	FIBERGLASS
42	1999	08/28	16:00:00	SZJ0204/F393	INBOARD	HOUSEBOAT	1993	66	55	5	8	SUMMERSET	FIBERGLASS
43	1999	07/02	15:40:00	TK2000956D896	OUTBOARD	HOUSEBOAT	1998	420	84	37	1	STARDUST	ALUMINUM
44	1999	07/02	15:40:00		OUTBOARD	HOUSEBOAT	UNK	0	70	52	6	ADIRER	ALUMINUM
45	1999	10/05	13:30:00		OUTBOARD	HOUSEBOAT	UNK	0	UNKNOWN	39	2		ALUMINUM
46	2000	05/27	11:00:00	GBN50516E969	INBOARD	HOUSEBOAT	1989	50	50	53	3	GIBSON	FIBERGLASS
47	2000	08/12			INBOARD	HOUSEBOAT	1970	540	34		0	TOYCAFT	FIBERGLASS
48	2000	08/05	15:31:00	NAT434210573	INBOARD/STERN DRIVE	HOUSEBOAT	1978	660	43	42	15	NATULI INE	FIBERGLASS
49	2000	05/29	13:30:00	GBN44264H990	INBOARD/STERN DRIVE	HOUSEBOAT	1990	470	44		0	GIBSON	FIBERGLASS
50	2000	07/22	12:20:00	FCX00025B999	INBOARD/STERN DRIVE	HOUSEBOAT	1999	230	59	36	9	FUN COUNTRY	ALUMINUM

TOTAL

ZBARPT1B
STRUCK BY BOAT OR PROPELLER

02/22/02

ALL

LIST	INSTR	STATE	COUNTY	OPERATION1	OPERATION2	OPERATION3	OPEROTHER	ACC_TYPE1
1	NONE	OR	31	OTHER				STRUCK BY PROPELLER/ENGINE
2	NONE	IA	103	OTHER				FALLS OVERBOARD
3	UNKNOWN	CA	89	MANEUVERING				STRUCK BY PROPELLER/ENGINE
4	STATE	CA	55	MANEUVERING				STRUCK BY PROPELLER/ENGINE
5	NONE	CA	77	MANEUVERING				COLLISION WITH VESSEL
6	STATE	CA	89	MANEUVERING				STRUCK BY PROPELLER/ENGINE
7	UNKNOWN	CA	89	DRIFTING				FALLS OVERBOARD
8	UNKNOWN	GA	117	WATER SKIING, SKIER DN				STRUCK BY PROPELLER/ENGINE
9	NONE	MO	29	DRIFTING				STRUCK BY PROPELLER/ENGINE
10	OTHER	AZ	15	DRIFTING				STRUCK BY PROPELLER/ENGINE
11	UNKNOWN	CA	89	DRIFTING				COLLISION WITH VESSEL
12	UNKNOWN	CA	63	CRUISING				FALLS OVERBOARD
13	UNKNOWN	CA	59	MANEUVERING				STRUCK BY PROPELLER/ENGINE
14	UNKNOWN	CA	89	DRIFTING				STRUCK BY PROPELLER/ENGINE
15	NONE	AZ	15	CRUISING				FALLS OVERBOARD
16	UNKNOWN	NV	3	CRUISING				FALLEN SKIER
17	UNKNOWN	CA	83	MANEUVERING				COLLISION WITH FLOATING OB
18	UNKNOWN	CA	SHASTA	AT ANCHOR				COLLISION WITH VESSEL
19	UNKNOWN	CA	SHASTA	TIED TO DOCK/MOORING				STRUCK BY BOAT
20	UNKNOWN	CA	SHASTA	CHANGING DIRECTION	OTHER		BACKING UP BEACHED	STRUCK BY PROPELLER/ENGINE
21	U.S. POWER SQUADRON	GA	HALL	OTHER				STRUCK BY BOAT
22	UNKNOWN	NV	CLARK	DRIFTING				STRUCK BY PROPELLER/ENGINE
23	STATE COURSE	NH	BELKNAP	CRUISING				COLLISION WITH VESSEL
24	NONE	UT	KANE	CRUISING	TOWING ANOTHER BOAT	DRIFTING		STRUCK BY PROPELLER/ENGINE
25	NONE	UT	KANE	DRIFTING	AT ANCHOR			STRUCK BY PROPELLER/ENGINE
26	UNKNOWN	CA	TUOLUMNE	CHANGING SPEED				FALLS OVERBOARD
27	NONE	KY	MARSHALL	CRUISING			MANEUVERING	STRUCK BY BOAT
28	NONE	NY	JEFFERSON	CHANGING DIRECTION				STRUCK BY PROPELLER/ENGINE
29	NONE	UT	KANE	CHANGING DIRECTION				STRUCK BY PROPELLER/ENGINE
30	UNKNOWN	AZ	MARICOPA	DOCKING/UNDOCKING				COLLISION WITH FLOATING OB
31	OTHER	FL	LEE	CRUISING				COLLISION WITH VESSEL
32	UNKNOWN	IL	MOULTRIE	TIED TO DOCK/MOORING				COLLISION WITH VESSEL
33	NONE	IN	MONROE	DOCKING/UNDOCKING				STRUCK BY BOAT
34	UNKNOWN	NV	CLARK	TIED TO DOCK/MOORING				STRUCK BY BOAT
35	UNKNOWN	TN	DEKALB	UNKNOWN			UNKNOWN	STRUCK BY BOAT
36	UNKNOWN	UT	COCONINO	TOWING ANOTHER BOAT				FALLS OVERBOARD
37		AZ	MOHAVE	TIED TO DOCK/MOORING				STRUCK BY BOAT
38		AZ	MOHAVE	DRIFTING				COLLISION WITH VESSEL
39		AZ	MOHAVE	TIED TO DOCK/MOORING				COLLISION WITH VESSEL
40	NONE	GA	HALL	OTHER			LEAVING RAFT UP	FALLS OVERBOARD
41	USCG AUXILIARY	KY	CLINTON	AT ANCHOR				STRUCK BY BOAT
42	USCG AUXILIARY	TX	TRAVIS	DOCKING/UNDOCKING			APPROACHING DOCK	STRUCK BY PROPELLER/ENGINE
43	NONE	UT	KANE	TIED TO DOCK/MOORING				STRUCK BY BOAT
44	NONE	UT	KANE	CRUISING				STRUCK BY BOAT
45	NONE	UT	SAN JUAN	DOCKING/UNDOCKING				STRUCK BY PROPELLER/ENGINE
46	NONE	TN	DEKALB	TIED TO DOCK/MOORING				STRUCK BY BOAT
47	UNKNOWN	AK	JUNEAU	TIED TO DOCK/MOORING				STRUCK BY BOAT
48	NONE	MO	CAMDEN	DOCKING/UNDOCKING				STRUCK BY PROPELLER/ENGINE
49	UNKNOWN	NV	CLARK	DOCKING/UNDOCKING	DRIFTING			STRUCK BY BOAT
50	INFORMAL	NV	CLARK	CRUISING				COLLISION WITH VESSEL

TOTAL

ALL

ACC_TYPE2	ACC_TYPE3	CASE_NBR	BOAT_ID
STRUCK BY BOAT OR PROPELLER		199145069	A
		199219032	A
		19925074	A
		19925192	A
STRUCK BY BOAT		19925309	A
		19925513	A
STRUCK BY PROPELLER/ENGINE		19925628	A
		199314047	A
		199331169	A
		19933272	A
STRUCK BY BOAT OR PROPELLER		19935092	B
STRUCK BY PROPELLER/ENGINE		19935306	A
		19935430	A
		19935509	A
STRUCK BY BOAT OR PROPELLER		19943125	A
STRUCK BY BOAT OR PROPELLER		199434173	A
STRUCK BY PROPELLER/ENGINE		19945403	A
STRUCK BY BOAT		199505292	B
		199505317	B
		199505006	A
		199514069	A
		199534221	A
STRUCK BY PROPELLER/ENGINE		199535083	B
COLLISION WITH VESSEL		199553007	A
COLLISION WITH VESSEL		199553007	C
STRUCK BY PROPELLER/ENGINE		199605030	A
		199621063	A
		199639024	A
		199653110	A
COLLISION WITH VESSEL	STRUCK BY BOAT	199803303	A
COLLISION WITH FIXED OBJECT	STRUCK BY BOAT	199812105	A
STRUCK BY BOAT		199817113	B
		199818069	B
		199834010	A
		199850156	B
STRUCK BY BOAT		199853062	A
		199903082	A
STRUCK BY BOAT		199903100	B
STRUCK BY BOAT		199903403	A
STRUCK BY PROPELLER/ENGINE		199914050	A
		199921012	A
		199951250	A
		199953081	A
		199953081	B
		199953154	B
		2000-50037	B
		2000-AK-0045	A
		2000-MO-0252	A
		2000-NV-0032	A
STRUCK BY BOAT		2000-NV-0100	C

ALL

ZBARPTIC
STRUCK BY BOAT OR PROPELLER

02/22/02

LIST CAUSE1	CAUSE2	CAUSE3	CAUSE_OTHER	ACC_DESC1
1 OTHER				SWIMMER OR DIVER INVOLV
2 OTHER				OPERATOR DID NOT CONTRI
3 NO PROPER LOOKOUT				SWIMMER OR DIVER INVOLV
4 NO PROPER LOOKOUT	INEXPERIENCE OF OPERATOR			STRUCK BY PROPELLER
5 ENGINE FAILURE	OTHER VESSEL/OPERATOR AT FAULT	STRONG CURRENT, ROUGH WATERS, WEATHER, ETC.		STRUCK BY BOAT
6 NO PROPER LOOKOUT	INEXPERIENCE OF OPERATOR			STRUCK BY PROPELLER
7 SLIPPERY SURFACE	OPERATOR INATTENTION OR CARELESSNESS			STRUCK BY PROPELLER
8 OPERATOR INATTENTION OR CARELESSNESS	0			INNER TUBES, KITES, ETC
9 FALLS DURING SHARP TURNS OR ACCELERATION	0			STRUCK BY PROPELLER
10 OPERATOR INATTENTION OR CARELESSNESS	0			ALCOHOL INVOLVED
11 EXCESSIVE SPEED	OTHER VESSEL/OPERATOR AT FAULT	INEXPERIENCE OF OPERATOR		SWIMMER OR DIVER INVOLV
12 SITTING ON GUNNEL, TRANSOM, BOW, ETC.	0			STRUCK BY PROPELLER
13 OTHER	0			STRUCK BY PROPELLER
14 OTHER VESSEL/OPERATOR AT FAULT	0			SWIMMER OR DIVER INVOLV
15 FALLS WHILE MOVING, STANDING, OR LEANING OVER OTHER				HELP WAS NEARBY
16 OTHER				OPERATOR DID NOT CONTRI
17 NO PROPER LOOKOUT	OPERATOR INATTENTION OR CARELESSNESS	OTHER		SWIMMER OR DIVER INVOLV
18 OPERATOR INEXPERIENCE			HIGH IDLE	
19 OPERATOR INEXPERIENCE				
20 OPERATOR INATTENTION	NO PROPER LOOKOUT	ALCOHOL USE		
21 ALCOHOL USE	NO PROPER LOOKOUT	RESTRICTED VISION		
22 WEATHER	NO PROPER LOOKOUT	OPERATOR INEXPERIENCE	NO ONE AT CONTROLS	
23 EXCESSIVE SPEED	NO PROPER LOOKOUT	OPERATOR INATTENTION		
24 WEATHER	OPERATOR INEXPERIENCE			BOAT FOUND UPRIGHT DRIF
25 OPERATOR INATTENTION				
26 EXCESSIVE SPEED	OPERATOR INATTENTION			
27 CARELESS/RECKLESS OPERATION				
28 NO PROPER LOOKOUT				
29 EQUIPMENT FAILURE				
30 CARELESS/RECKLESS OPERATION	WEATHER		CARELESS/ INATTENTION	
31 ALCOHOL USE	CARELESS/RECKLESS OPERATION	OPERATOR INATTENTION		
32 NO PROPER LOOKOUT	WEATHER			
33 PASSENGER/SKIER BEHAVIOR			DESIGN OF SWIM LADDER ATTACHEME NONE	
34 WEATHER	EXCESSIVE SPEED			
35 PASSENGER/SKIER BEHAVIOR				
36 UNKNOWN				
37 CONGESTED WATERS	OPERATOR INEXPERIENCE	NO PROPER LOOKOUT		
38 EXCESSIVE SPEED	OPERATOR INATTENTION	WEATHER		
39 NO PROPER LOOKOUT				
40 ALCOHOL USE	OPERATOR INATTENTION	OPERATOR INEXPERIENCE		
41 NO PROPER LOOKOUT				
42 OTHER			OTHER OPERATOR'S FAULT	
43 UNKNOWN				
44 MACHINERY FAILURE	EQUIPMENT FAILURE	OPERATOR INATTENTION		
45 CARELESS/RECKLESS OPERATION				
46 OPERATOR INATTENTION			VICTIM INATTENTION	
47 UNKNOWN				
48 OPERATOR INEXPERIENCE	HAZARDOUS WATERS			

TOTAL

ALL

ACC_DESC2

ACC_DESC3

ACC_DESCC

ED

STRUCK BY PROPELLER

OPERATOR DID NOT CONTRIBUTE TO FAULT

ED

STRUCK BY PROPELLER

OPERATOR CONTRIBUTED TO FAULT

OPERATOR CONTRIBUTED TO FAULT
OPERATOR DID NOT CONTRIBUTE TO FAULT

OPERATOR CONTRIBUTED TO FAULT

OPERATOR CONTRIBUTED TO FAULT
STUCK BY PROPELLER

0 SICK BY PROPELLER

OPERATOR CONTRIBUTED TO FAULT

0

03

SWIMMER OR DIVER INVOLVED
OPERATOR DID NOT CONTRIBUTE

THE TO FAULT

STRUCK BY PROPELLER

D TO FALL T

→ C

OPERATOR DID NOT CONTRIBUTE TO FAULT

OPERATOR DID NOT CONTRIBUTE TO FAULT

000

ED

OPERATION DID NOT GO
STRUCK BY PROPELLER

OPERATOR DID NOT CONTRIBUTE TO FAULT

0

BUTE TO FAULT

OPERATION DID NOT CONTRIBUTE TO FAILURE

ED

STRUCK BY PROPELLER

OPERATOR CONTRIBUTED TO FAULT

TING

Appendix B

Supporting Cost Information

For

USCG Proposed Technology

Fax

To: John McKnight, NMMA
Phone: 202-721-1604
Fax: 202-861-1181

From: Mark Suttie
Phone: 928-645-6053
Fax: 928-645-6107
e-mail: suttie-mark@aramark.com

Date: 03/08/02
Pages: 17

John, the prices I state in the Lake Powell Resorts & Marinas comment letter were established with the following information. I will provide a brief description in the order of this fax:

Pg 3 Cover letter dated 2/8/02 from Propeller Safety Technologies quoting prices for their propeller guard and swim ladder interlock system.

Pg 4 Invoice #6186 for propeller guards and swim ladder interlock.

Pg 5 Mercury Marine Parts & Accessories catalogue showing list price for the dual engine ignition cut-off switch.

Pg 6 W.W. Grainger catalogue prices for the "aft vision" safety mirrors.

Pg 7-10 W.W. Grainger internet prices (current prices) for the same mirrors. The price has increased.

Pg 11 Mercury Marine pricing for propeller (list and dealer price).

Pg 12 Mercury Marine pricing for gearcase (list and dealer price).

Pg 13-14 Nat'l Park Service cover letter and rate approval for labor.

Pg 15-17 Nat'l Park Service cover letter and rate approval for boat launch and retrieval.

This information should establish credibility to the prices I stated in my Comments letter. Please feel free to include this information in any manner that will support your comments.

March 8, 2002

Sincerely,

Mark Suttie

Mark Suttie

928-645-6053

suttie-mark@aramark.com

February 8, 2000

To: Mark Suttie fax: 520-645-6107

From: Keith Jackson

re: Product Pricing

Dear Mark,

Received the spec sheets, thank you! I look forward to receiving your boat pictures in the next few days.

1. Pricing on two SwimGuards is as follows:

60hp - 90hp: (\$299.00 ea.) :	\$598.00
Powder Coating:	<u>\$69.00</u>
Sub Total:	\$667.00

2. Pricing on Swimmer Safety Systems:

- a) You will need two systems. Each motor must have an independent system.
- b) Let me know if you want to install a system on the houseboat and the deck boat.

Swimmer Safety System: (\$68.60 ea.) :	\$137.20
--	----------

Total:	\$804.20
--------	----------

It was nice talking with you again! If you have any questions, please contact me.

Thanks again,


Keith Jackson

PROPELLER SAFETY TECHNOLOGIES

19806 HIRSCH CT. B-7
 ANDERSON, CA 96007
 www.propguardinc.com
 530-365-9663

Invoice

DATE	INVOICE #
2/18/2000	6186

BILL TO
LAKE POWELL RESORTS AND MARINAS P.O. BOX 1926 2040 E. FRONTAGE RD. PAGE, AZ 86040

SHIP TO
LAKE POWELL RESORTS AND MARINAS P.O. BOX 1926 2040 E. FRONTAGE RD. PAGE, AZ 86040

P.O. NUMBER	TERMS	REP	SHIP	VIA	F.O.B.	PROJECT
VERBAL- MS	PER-PAID	101	2/18/2000	HAND DEL.		
QUANTITY	ITEM CODE	DESCRIPTION			PRICE EACH	AMOUNT
2	60/90 HP GUAR	60/90 HP SWIMGUARD 60 HP MERC BF			299.00	598.00
2	POWDER COATIN	POWDER COATING			34.50	69.00
2	OUTBOARD	SWIMMER SAFETY SYSTEM - OUTBOARD UPC # 68464700099 S/N # 1121, 1123			68.60	137.20
		PRODUCT WILL BE HAND DELIVERED PER KEITH J. Sales Tax			0.00	0.00
THANK YOU AND ALWAYS BOAT SAFE!!!					Total	\$804.20

TWO STATION START/STOP PANELS.

Mounts in a 3-3/8 in.(86 mm) hole.

TWO STATION START/STOP PANEL

76426A 7 41C38 68.95

2 ft.(610 mm) harness with standard 8-pin outboard plug. Includes wiring for all electric gauges except trim gauge.

Fits Mercury/Mariner outboards with 8 pin engine harnesses.



76426A 9 16C79 28.00

3 ft.(910 mm) harness connects in place of Ignition switch.

Fits MCM/MIE gasoline engines

LANYARD STOP SWITCH (CONT.)

87- 19674B 7 23C45 39.10

5 ft.(1.53 m) harness. Surface mount or flush mount. Used with outboard Ignition/Choke Assembly (84-816626A__ series) and MCM/MIE models.

Fits Mercury/Mariner outboards with Ignition/Choke assemblies, Mercury Jet Drives and MCM/MIE engines.

Priced individually, sold @ multiples of 24



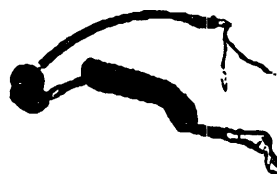
87-814324A 2 32C11 53.50

Dual engine kit. 5 ft.(1.53 m) harness. Surface mount or flush mount. Used with outboard Ignition/Choke Assembly (84-816626A__ series) and MCM/MIE models.

87-814324B 2 39F07 66.75

Dual engine kit. 5 ft.(1.53 m) harness. Surface mount or flush mount. Used with outboard Ignition/Choke Assembly (84-816626A__ series) and MCM/MIE models.

Priced individually, sold @ multiples of 24



87-823037A 1 16C50 27.50

Fits Mercury/Mariner 2.5, 3.3, 4, 5 hp (U.S. S/N 0A309601 and above; Belgium S/N 9589154 and above)



87-856654A 2 16C69 27.80

3-1/2 in.(89 mm) wires, does not include cap. Normally closed switch

Fits Mercury/Mariner outboards.



87-856654A 4 38C20 63.75

20 ft.(6.2 m) harness. Includes 2 caps.

Fits Mercury/Mariner outboards and MCM/MIE engines.

LANYARD STOP SWITCHES

Lanyard cord attaches to the toggle switch or cap and boat driver. When switch toggles or cap pulls off switch, the Ignition is interrupted and the engine shuts down.

LANYARD STOP SWITCH

87- 19674Q 2 24C69 41.15

5 ft.(1.53 m) harness. Surface mount or flush mount. Used with outboard Ignition/Choke Assembly (84-816626A__ series) and MCM/MIE models.

Fits Mercury/Mariner outboards with Ignition/Choke assemblies, Mercury Jet Drives and MCM/MIE engines.

Quicksilver Display Packaging

87- 19674B 1 503D66 987.55

5 ft.(1.53 m) harness. Surface mount or flush mount. Used with outboard Ignition/Choke Assembly (84-816626A__ series) and MCM/MIE models.

Fits Mercury/Mariner outboards with Ignition/Choke assemblies, Mercury Jet Drives and MCM/MIE engines.

Priced & packaged in qty. of 24

Quicksilver Display Packaging

Safety Equipment

Safety and Security Mirrors

Order today! phone fax visit www.grainger.com

CONVEX STYLE SAFETY AND SECURITY MIRRORS

BROSSARD

Optically clear reflective surface provides more than 160° viewing angle



Circular Convex



Rectangular Convex

Enable dock workers and drivers to see around blind corners and doorways. Also used for security to monitor aisles and high risk areas. All circular and rectangular convex mirrors are trimmed with heavy extruded rubber rim. Suitable for indoor or outdoor use and require minimum maintenance.

Adjustable swivel ball assembly and heavy gauge steel mounting bracket enable fine adjustment of proper angle for effective viewing. Mirror size in inches equates to viewing distance in feet, i.e. 18" mirror distance seen clearly is 18 feet. Rectangular mirrors use height.

Lightweight, shatterproof Klear Vu® acrylic lens mounted to durable hardboard backing or steel backing for added strength and durability. For use in harsh environments. Tough, double-strength glass lens models mounted to hardboard backing are also available. Klear Vu® brand by Brossard.

Size (In.)	Approx. Distance of Sight (Ft.)	Mir. Model	Stock No.	List	Each	Lots 3	Shpg. Wt.	Mir. Model	Stock No.	List	Each	Lots 3	Shpg. Wt.	Mir. Model	Stock No.	List	Each	Lots 3	Shpg. Wt.
ACRYLIC LENS/HARDBOARD BACKING								ACRYLIC LENS/STEEL BACKING						GLASS LENS/HARDBOARD BACKING					
CIRCULAR CONVEX MIRRORS																			
12 Dia.	12	P120	3W670	\$33.49	\$31.05	\$29.47	4.0	P-120MR	6A72	\$50.02	\$41.70	\$39.61	4.5	120	1M876	\$35.34	\$29.45	\$27.98	5.0
18	18	P180	2A095	66.88	52.35	49.73	6.0	P-180MR	28C95	66.27	55.25	52.47	7.5	180	1M868	55.75	46.50	44.14	8.0
26	26	P260	5A121	108.83	86.90	82.54	10.0	P-260MR	5W32	113.08	94.25	89.52	13.0	260	1M866	85.68	71.40	67.83	14.0
30	30	P300	3W672	142.32	128.80	122.35	14.0	P-300MR	48C13	139.88	116.78	110.83	17.0	300	1M864	110.88	92.40	87.78	18.0
36	36	P360	5A122	178.08	142.35	135.21	20.0	P-360MR	2A229	189.63	158.25	150.13	24.0	360	1M862	123.48	102.00	97.76	25.0
RECTANGULAR CONVEX MIRRORS																			
12H x 18L	18	P1218	3W676	57.98	51.80	49.18	6.0	P-1218MR	1M802	77.17	64.35	61.10	7.0						
18 x 26	26	P1826	3W677	102.63	91.50	86.89	10.0	P-1826MR	1M800	131.48	109.68	104.09	12.0						
20 x 30	30	P2030	3W678	132.82	118.60	112.67	12.0	P-2030MR	1M798	172.80	147.85	138.80	14.0						
24 x 36	36	P2436	3W679	173.88	155.25	147.43	15.0	P-2436MR	1M796	211.36	178.25	167.33	19.0						

DOMESTYLE SAFETY AND SECURITY MIRRORS

Lightweight, shatterproof All Vu® acrylic dome mirrors offer wide angle visibility of aisle, pedestrian or vehicle traffic at blind intersections and corners. For indoor or outdoor use. All mirrors have heavy extruded rubber rim. Full and half dome styles are available with either durable hardboard backing or steel backing for added strength and durability.

Require minimum maintenance. Viewing distance of mirror in feet is equivalent to its size in inches, i.e. 18" mirror distance seen clearly is 18 feet. Mirrors can be suspended or fastened to a wall or ceiling with hangers furnished. All Vu® brand by Brossard.

Full Dome Mirrors provide 360° viewing recommended for 4-way intersections. Ceiling type. Available with hardboard or steel backing. Extra large 48" size also available.

Half Dome Mirrors for 3-way "T" intersections allow 180° viewing. Wall or ceiling type. Choice of hardboard or steel backing.

Quarter Dome Mirrors enable 90° of viewing at 2-way, "L-shaped" intersections to help avoid collisions. Corner mounted. Available with hardboard backing only.

BROSSARD



Half Dome 180° View



Full Dome 360° View



Quarter Dome 90° View

Size Dia. (In.)	Approx. Distance of Sight (Ft.)	Brossard Model	Stock No.	List	Each	Lots 3	Shpg. Wt.	Brossard Model	Stock No.	List	Each	Lots 3	Shpg. Wt.
HARDBOARD BACKING								STEEL BACKING					
360° VIEW FULL DOME ACRYLIC MIRRORS													
18	18	AV18F	3W671	\$108.88	\$73.05	\$69.37	7.0	AV18FS	1M848	\$100.80	\$84.00	\$79.80	8.0
26	26	AV26F	5A123	152.61	116.85	110.97	15.0	AV26FS	1M838	161.22	134.35	127.63	17.0
32	32	AV32F	3W673	217.35	163.50	155.12	20.0	AV32FS	1M832	225.54	188.00	178.55	29.0
36	36	AV36F	5A124	248.09	179.50	170.32	28.0	AV36FS	1M826	247.59	206.50	196.01	32.0
48	48	AV48F	1AD80	320.04	266.75	253.37	40.0						
180° VIEW HALF DOME ACRYLIC MIRRORS													
18	18	AV18H	5A125	57.69	42.60	40.45	4.0	AV18HS	1M846	58.77	49.00	46.54	5.0
26	26	AV26H	5A126	87.99	68.80	65.34	7.0	AV26HS	1M834	94.94	79.15	75.16	9.0
32	32	AV32H	3W674	137.02	100.36	95.31	15.0	AV32HS	1M830	138.47	115.40	109.83	15.0
36	36	AV36H	3W675	177.34	103.45	98.28	20.0	AV36HS	1M824	148.93	124.75	117.90	16.0
90° VIEW QUARTER DOME ACRYLIC MIRRORS													
18	18	AV18Q	6AJ57	29.00	24.17	22.96	3.0						
26	26	AV26Q	2AZ20	46.80	39.05	37.05	5.0						
32	32	AV32Q	1M828	62.49	52.10	49.48	7.0						
36	36	AV36Q	1M822	77.99	65.00	61.75	8.0						

GRAINGER



Keywords



Item #



Manufacturer



Model #

User Name

 Enter your user name
and password here.

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Item Details

Product Category: [Safety & Security](#) > [Monitoring Systems](#) > [Safety and Security Mirrors](#)
Description

Rectangular Convex Mirror, Acrylic Lens and Steel Backing, 12 inches x 18 inches

Your Price: \$67.60

Ship: Today

Unit of Measure: 1

Grainger Item#: 1M802

Manufacturer: KLEAR-VU BY

BROSSARD

Mfg. Model#: P-1218MR

Catalog Page: 2686

 Select ☐ Qty.

 Price shown may not reflect your price. [Log-in](#) above, or [click here](#) to register.


TECHNICAL SPECIFICATIONS

Diameter(In):
12H x 18L

Approximate Viewing Distance(Ft):
18

NOTES & RESTRICTIONS

Modification & Service available contact your local branch.

See Catalog Page for application and/or safety information.

FEATURED PRODUCTS:


 Rectangular Convex Mirror, Acrylic
Lens and Hardboard Backing, 12
inches x 18 inches

Manufacturer: ALL-VU BY

BROSSARD

Grainger Item#: 3V676

Ship: Today

Your Price: \$54.50

 Qty.

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[\(Browse By Category\)](#)
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Item Details

[Back](#)
Product Category: [Safety & Security](#) > [Monitoring Systems](#) > [Safety and Security Mirrors](#)
Description

Rectangular Convex Mirror, Acrylic Lens and Steel Backing, 18 inches x 26 inches

Your Price: \$115.20

Ship: Today

Unit of Measure: 1

Grainger Item#: 1M800

Manufacturer: KLEAR-VU BY

BROSSARD

Mfg. Model#: P-1826MR

Catalog Page: [P. 2686](#)

 Select ☐ Qty.

 Price shown may not reflect your price. [Log-in](#) above, or [click here](#) to register.


TECHNICAL SPECIFICATIONS

Diameter(In):
18 x 26

Approximate Viewing Distance(Ft):
26

NOTES & RESTRICTIONS

 Modification & Service available contact your local branch.
See Catalog Page [P. 26](#) for application and/or safety information.

User Name
[go!](#)

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FEATURED PRODUCTS:


Motion Sensor Switch Adaptive Wall Switch, Gray 120/277V AC
Manufacturer: HUBBELL

Grainger Item#: 1V000

Ship: Today

Your Price: \$77.80

 Qty:

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Manufacturers



Part Numbers

(Browse By Category)

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User Name

go!

Enter your user name
and password here.[Forgot your password?](#)[Not registered yet?](#)[Need help registering?](#)[View Suggested Lists](#)**Item Details**[Back](#)**Product Category:** Safety & Security > Monitoring Systems > Safety and Security Mirrors**Description**

Circular Convex Mirror, Acrylic Lens and Steel Backing, 12 inch Diameter

Your Price: \$43.85

Ship: Today

Unit of Measure: 1

Grainger Item#: 6AR72

Manufacturer: KLEAR-VU BY BROSSARD

Mfg. Model#: P-120MR

Catalog Page: 2666

Select.



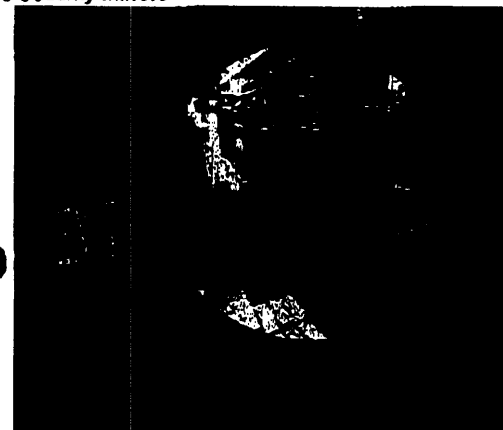
Qty.



ADD TO ORDER

Price shown may not reflect your price. [Log-in](#) above or [click here](#) to register.**NOTES & RESTRICTIONS**

Modification & Service available contact your local branch.

See Catalog Page [16](#) for application and/or safety information.**TECHNICAL SPECIFICATIONS**Diameter(In):
12 Dia.Approximate Viewing Distance(Ft):
12**FEATURED PRODUCTS:**Circular Convex Mirror, Acrylic Lens
and Hardboard Backing, 12 inch
DiameterManufacturer: KLEAR-VU BY
BROSSARD
Grainger Item#: 3W870
Ship: Today
Your Price: \$32.65

Qty:

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[\(Browse By Category\)](#)

Item Details

[Back](#)
Product Category: Safety & Security > Monitoring Systems > Safety and Security Mirrors

Description

Circular Convex Mirror, Acrylic Lens and Steel Backing, 18 inch Diameter

Your Price: \$58.10

Ship: Today

Unit of Measure: 1

Grainger Item#: 2BC95

Manufacturer: KLEAR-VU BY BROSSARD

Mfg. Model#: P-180MR

Catalog Page: 2686

 Select ☐

 Qty.

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NOTES & RESTRICTIONS

Modification & Service available contact your local branch.

See Catalog Page for application and/or safety information.

TECHNICAL SPECIFICATIONS

Approximate Viewing Distance(Ft):

18

Diameter(In):

18

User Name

Enter your user name and password here.

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FEATURED PRODUCTS:


Circular Convex Mirror, Acrylic Lens and Hardboard Backing, 18 inch Diameter

Manufacturer: KLEAR-VU BY BROSSARD
Grainger Item#: 2A095
Ship: Today
Your Price: \$55.05

 Qty.

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Part Number			Part Number		DS-1000	
Red Designates Superseded Part			9011G45		Active Part Number	
Blue Designates Active Part with extra charges						
Class	Number	Description	Unit Price	Unit Price	Unit Price	Unit Price
1667	9011G45	GEAR HOUSING		2,470.55	1,482.33	ACT
1667	9011G46	GEAR HOUSING		2,470.55	1,482.33	ACT
1667	9011G47	GEAR HOUSING		2,470.55	1,482.33	ACT
1667	9011G48	GEAR HOUSING		2,470.55	1,482.33	ACT
1667	9011G49	GEAR HOUSING		2,470.55	1,482.33	ACT
1667	9011G 5	GEAR HSG-XL-BLACK	1667 9011G45	2,470.55	1,482.33	ACT
1667	9011G50	GEAR HOUSING		2,470.55	1,482.33	ACT
1667	9011G51	GEAR HOUSING		2,470.55	1,482.33	ACT
1667	9011G52	GEAR HSG-L GRAY		2,470.55	1,482.33	ACT
1667	9011G53	GEAR HOUSING		2,470.55	1,482.33	ACT
1667	9011G54	GEAR HOUSING		2,470.55	1,482.33	ACT
1667	9011G55	GEAR HOUSING		2,470.55	1,482.33	ACT
1667	9011G56	GEAR HOUSING		2,470.55	1,482.33	ACT
1667	9011G57	GEAR HSG-L BLK		2,470.55	1,482.33	ACT
1667	9011G58	GEAR HSG-L GRAY		2,470.55	1,482.33	ACT
1667	9011G59	GEAR HSG-BASIC-BL		2,470.55	1,482.33	ACT
1667	9011G 6	GEAR HSG-XL GRAY	1667 9011G45	2,470.55	1,482.33	ACT



IN REPLY REFER TO:

United States Department of the Interior

NATIONAL PARK SERVICE

Glen Canyon National Recreation Area

Box 1507

Page, Arizona 86040

AUG 23 2000

File
8/23/00

C50 Boat Repair Labor Rates

Terry Sides, Financial Analyst
ARAMARK Sports & Entertainment
Services, Inc.
P.O. Box 1926
Page, Arizona 86040

Dear Terry:

We have reviewed your 2000 rate proposal for boat repair labor rates (skilled and unskilled) within Glen Canyon National Recreation Area with the following results.

A "Simplified Review of Similar Services" was conducted under the National Park Service guidelines and the process of comparability. The facilities used for this rate review are companies in the Page, Arizona area and those marinas used for slip comparability. The facilities were all contacted by telephone during the week of August 7, 2000, to verify their rates.

Based on the data collected and analyzed, we have approved rates for the 2000 season as requested. Please contact Kathy Fleming, Chief, Concessions Management at (520) 608-6340 or Uplake Concessions Management Specialist Marylou Douglas at (435) 684-7425, if you have any questions or would like clarification on the method of analysis or calculation for the recommended rate approval.

Sincerely,

Joseph F. Alston
Superintendent

Enclosure

ARAMARK Sports and Entertainment Services, Inc.
Boat Repair Labor Rates

2000 Approved Rates

	Base	CSA	Published Rate
Skilled Labor Rate			
Per Hour	\$66.00	\$3.00	\$69.00
Unskilled Labor Rate			
Per Hour	\$37.30	\$1.70	\$39.00
After Hours Premium			
Per Hour	\$37.30	\$1.70	\$39.00

General Terms and Conditions of Boat Repair Labor Rates:

- The skilled labor rates are for services performed by mechanics, painters, fiberglassers, welders and sandblast operators.
- Rates are exclusive of applicable state and local sales transaction taxes.
- When applicable, flat rate time for service will be used.

Approved: _____

Joseph D. Conti
Superintendent

Date: _____

7-23-00



United States Department of the Interior

NATIONAL PARK SERVICE
Glen Canyon National Recreation Area
Box 1507
Page, Arizona 86040

IN REPLY REFER TO:

MAR 3 2000

Bill

C50 Marina Services

Terry Sides, Financial Analyst
ARAMARK Sports and Entertainment
Services, Inc.
P.O. Box 1926
Page, Arizona 86040

Dear Terry:

We have reviewed your 2000 rate increase proposal for boat launch and retrieval rates within Glen Canyon National Recreation Area with the following results.

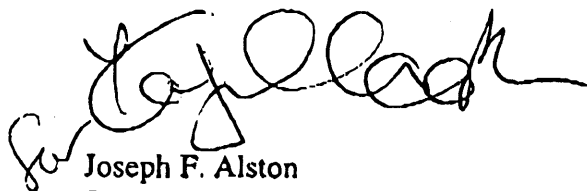
A "Simplified Review of Similar Services" was conducted under the National Park Service guidelines and the process of comparability. The comparables identified in your submittal were contacted by telephone the week of February 1, to verify information on their service. We did not use Lake Pleasant as they include unlimited launch and retrievals in their dry storage rates, and we removed Overland Transport as it is a petroleum company that mainly carries oil products over land.

Based on the data collected and analyzed, we approved the rates for the 2000 season as submitted and corrected, except for the additional fee for the blocking of a boat. The additional fee for the blocking of boats is being denied. As such, we have added language to the Terms and Conditions to state that the blocking of the boat is included in the rate.

We are concerned that going from a round trip rate to 1-way and measuring the overall length of the boat instead of the hull length, adding an additional \$60 to \$120 to the fee is more than the visitor should expect to pay at this time. We are also requesting that you implement the increase over a 2-year period, charging ½ of the increase during the 2000 operating season and ½ during the 2001 operating season. As this is a substantial increase, we will expect you to notify all of your dry storage customers prior to implementing the new rate this season either by letter to each customer or include a notice in the next billing to each customer. This notification will include the language that they will be allowed one round trip launch and retrieval at the previous rate during the 2000 operating season. All subsequent trips will be billed at the approved rate for the 2000 and 2001 operating seasons.

Please contact Kathy Fleming, Chief, Concessions Management at (520) 608-6340 or Uplake Concessions Management Specialist Marylou Douglas at (435) 684-7425, if you have any questions or would like clarification on the method of analysis or calculation for the recommended rate approval.

Sincerely,

A handwritten signature in black ink, appearing to read "J. Alston", with a stylized flourish at the end.

Joseph F. Alston
Superintendent

Enclosure

ARAMARK Sports and Entertainment Services, Inc.
Launch and Retrieval

2000 Approved Rates (½ of the increase in 2000, ½ in 2001)

Boat Length	Requested Base	CSA	Approved Rate
Up to 49' 11" (overall length)	\$5.74	\$0.26	\$6.00
50' to 59' 11" (overall length)	6.70	0.30	7.00
Over 60' (overall length)	7.66	0.34	8.00

General Terms and Conditions:

- Rates are 1-way (launch or retrieval) e.g., a round trip launch and retrieval service for a 50-foot boat would be billed at \$14 per foot.
- Transportation permits for Utah and Arizona are not included in the rate per foot and will be added to the customers billing.
- Blocking of boats is included in the launch and retrieval rate.
- Rates are exclusive of applicable state and local sales transaction taxes.

Approved: Joseph D. Cuth Date: 3.3.00
Superintendent

EASYLINK 2380995S001 08MAR02 11:41/11:41 EST
FROM: 4952780
4952780 4952780 TTGC UD
TRAVEL TECHNOLOGY GROUP LTD
TO: 2028611181

SALES PERSON: 94
CUSTOMER NBR: 011425

ITINERARY
HFNVST

DATE: 08 MAR 02
PAGE: 01

TO: NATIONAL MARINE MFG ASSN
200 E RANDOLPH SUITE 5100
CHICAGO, IL 60601
NATIONAL MARINE MFG ASSN
200 E RANDOLPH SUITE 5100
CHICAGO, IL 60601
NATIONAL MARINE ASSOCIATION
1819 L STREET NW
SUITE 700

FOR: MCKNIGHT/JOHN M

27 MAR 02 - WEDNESDAY

AIR FRONTIER AIRLINES FLT:641 ECONOMY MULTI MEALS
LV BALTIMORE WASHNTN 900A EQP: BOEING 737 300
AR DENVER 1100A 04HR 00MIN
REF: TWKERR NON-STOP

MCKNIGHT/JOHN M SEAT- 9A CO-SV086505
AIR FRONTIER AIRLINES FLT:417 ECONOMY
LV DENVER 1215P EQP: BOEING 737 300
AR LOS ANGELES 140P 02HR 25MIN
REF: TWKERR NON-STOP
ARRIVE: TERMINAL 3

MCKNIGHT/JOHN M SEAT- 9A CO-SV086505
CAR LOS ANGELES NATIONAL CAR RENTAL INTER CAR AUTO A/C
PICK UP-1340
RETURN-28MAR

RATE PLAN	1 DAYS	0 HRS	USD	MI/KM	EX MI/KM
DAILY RATE			75.99	UNL	
XTRA DAY-			75.99	UNL	
XTRA HOUR-			38.00	UNL	
MANDATORY CHARGES			6.27		
APPROX RENTAL COST			86.26	UNL	
CONFIRMATION NUMBER	816084149	AISLE			RATE-GUARANTEED
CD-5708107		ID-NE554331400			

28 MAR 02 - THURSDAY

AIR FRONTIER AIRLINES FLT:426 ECONOMY MULTI MEALS
LV LOS ANGELES 235P EQP: BOEING 737 300
DEPART: TERMINAL 3 02HR 15MIN
AR DENVER 550P NON-STOP
REF: TWKERR

MCKNIGHT/JOHN M SEAT-17A CO-SV086505

CONTINUED ON PAGE 2

SALES PERSON: 94
CUSTOMER NBR: 011425

ITINERARY
HFNVST

DATE: 08 MAR 02
PAGE: 02

TO: NATIONAL MARINE MFG ASSN
200 E RANDOLPH SUITE 5100
CHICAGO, IL 60601

NATIONAL MARINE MFG ASSN
200 E RANDOLPH SUITE 5100
CHICAGO, IL 60601
NATIONAL MARINE ASSOCIATION
1819 L STREET NW
SUITE 700

FOR: MCKNIGHT/JOHN M

28 MAR 02 - THURSDAY

AIR FRONTIER AIRLINES FLT:644 ECONOMY
LV DENVER 640P

EQP: BOEING 737 300
03HR 15MIN
NON-STOP
REF: TWKERR

AR BALTIMORE WASHNTN 1155P

MCKNIGHT/JOHN M SEAT-19D CO-SV086505

WHO APPROVED RESERVATION JOHN MCKNIGHT

FULL COACH FARE...

AMOUNT TICKETED...395.50

NET SAVINGS.....

TRAVEL TECHNOLOGY PROVIDES YOU WITH 100,000 TRAVEL
INSURANCE WITH EACH TICKET PURCHASED

PLEASE RECONFIRM ALL FLIGHT INFORMATION

PRIOR TO DEPARTURE TO CHECK FOR POSSIBLE

SCHEDULE CHANGES THANK YOU

PLEASE ALLOW EXTRA TIME FOR PHOTO ID CHECK AT AIRPORT

AIRLINE TICKETS ARE NON-TRANSFERABLE

AIRPORT CHECKIN ONLY FOR BOARDING PASSES

PLEASE VERIFY AIRLINES HAVE RCVD FREQUENT FLYER NUMBER

IF E-TKT HAS BEEN REQUESTED PLEASE RECONFIRM WITH TTG

TO VIEW YOUR MOST CURRENT ITINERARY PLEASE SEE

WWW.VIRTUALLYTHERE.COM

WE WILL MAKE EVERY EFFORT TO NOTIFY YOU OF SCHEDULE
CHANGES. HOWEVER DUE TO INCREASED SCHEDULE CHANGES

WE ENCOURAGE YOU TO CONFIRM YOU FLIGHTS WITH THE

AIRLINES PRIOR TO DEPARTURE. THANK YOU FOR

YOUR ASSISTANCE.

Appendix C

Executive Order

#12866

Presidential Documents

Title 3—

Executive Order 12866 of September 30, 1993

The President

Regulatory Planning and Review

The American people deserve a regulatory system that works for them, not against them: a regulatory system that protects and improves their health, safety, environment, and well-being and improves the performance of the economy without imposing unacceptable or unreasonable costs on society; regulatory policies that recognize that the private sector and private markets are the best engine for economic growth; regulatory approaches that respect the role of State, local, and tribal governments; and regulations that are effective, consistent, sensible, and understandable. We do not have such a regulatory system today.

With this Executive order, the Federal Government begins a program to reform and make more efficient the regulatory process. The objectives of this Executive order are to enhance planning and coordination with respect to both new and existing regulations; to reaffirm the primacy of Federal agencies in the regulatory decision-making process; to restore the integrity and legitimacy of regulatory review and oversight; and to make the process more accessible and open to the public. In pursuing these objectives, the regulatory process shall be conducted so as to meet applicable statutory requirements and with due regard to the discretion that has been entrusted to the Federal agencies.

Accordingly, by the authority vested in me as President by the Constitution and the laws of the United States of America, it is hereby ordered as follows:

Section 1. *Statement of Regulatory Philosophy and Principles.*

(a) *The Regulatory Philosophy.* Federal agencies should promulgate only such regulations as are required by law, are necessary to interpret the law, or are made necessary by compelling public need, such as material failures of private markets to protect or improve the health and safety of the public, the environment, or the well-being of the American people. In deciding whether and how to regulate, agencies should assess all costs and benefits of available regulatory alternatives, including the alternative of not regulating. Costs and benefits shall be understood to include both quantifiable measures (to the fullest extent that these can be usefully estimated) and qualitative measures of costs and benefits that are difficult to quantify, but nevertheless essential to consider. Further, in choosing among alternative regulatory approaches, agencies should select those approaches that maximize net benefits (including potential economic, environmental, public health and safety, and other advantages; distributive impacts; and equity), unless a statute requires another regulatory approach.

(b) *The Principles of Regulation.* To ensure that the agencies' regulatory programs are consistent with the philosophy set forth above, agencies should adhere to the following principles, to the extent permitted by law and where applicable:

- (1) Each agency shall identify the problem that it intends to address (including, where applicable, the failures of private markets or public institutions that warrant new agency action) as well as assess the significance of that problem.
- (2) Each agency shall examine whether existing regulations (or other law) have created, or contributed to, the problem that a new regulation is

intended to correct and whether those regulations (or other law) should be modified to achieve the intended goal of regulation more effectively.

(3) Each agency shall identify and assess available alternatives to direct regulation, including providing economic incentives to encourage the desired behavior, such as user fees or marketable permits, or providing information upon which choices can be made by the public.

(4) In setting regulatory priorities, each agency shall consider, to the extent reasonable, the degree and nature of the risks posed by various substances or activities within its jurisdiction.

(5) When an agency determines that a regulation is the best available method of achieving the regulatory objective, it shall design its regulations in the most cost-effective manner to achieve the regulatory objective. In doing so, each agency shall consider incentives for innovation, consistency, predictability, the costs of enforcement and compliance (to the government, regulated entities, and the public), flexibility, distributive impacts, and equity.

(6) Each agency shall assess both the costs and the benefits of the intended regulation and, recognizing that some costs and benefits are difficult to quantify, propose or adopt a regulation only upon a reasoned determination that the benefits of the intended regulation justify its costs.

(7) Each agency shall base its decisions on the best reasonably obtainable scientific, technical, economic, and other information concerning the need for, and consequences of, the intended regulation.

(8) Each agency shall identify and assess alternative forms of regulation and shall, to the extent feasible, specify performance objectives, rather than specifying the behavior or manner of compliance that regulated entities must adopt.

(9) Wherever feasible, agencies shall seek views of appropriate State, local, and tribal officials before imposing regulatory requirements that might significantly or uniquely affect those governmental entities. Each agency shall assess the effects of Federal regulations on State, local, and tribal governments, including specifically the availability of resources to carry out those mandates, and seek to minimize those burdens that uniquely or significantly affect such governmental entities, consistent with achieving regulatory objectives. In addition, as appropriate, agencies shall seek to harmonize Federal regulatory actions with related State, local, and tribal regulatory and other governmental functions.

(10) Each agency shall avoid regulations that are inconsistent, incompatible, or duplicative with its other regulations or those of other Federal agencies.

(11) Each agency shall tailor its regulations to impose the least burden on society, including individuals, businesses of differing sizes, and other entities (including small communities and governmental entities), consistent with obtaining the regulatory objectives, taking into account, among other things, and to the extent practicable, the costs of cumulative regulations.

(12) Each agency shall draft its regulations to be simple and easy to understand, with the goal of minimizing the potential for uncertainty and litigation arising from such uncertainty.

Sec. 2. Organization. An efficient regulatory planning and review process is vital to ensure that the Federal Government's regulatory system best serves the American people.

(a) *The Agencies.* Because Federal agencies are the repositories of significant substantive expertise and experience, they are responsible for developing regulations and assuring that the regulations are consistent with applicable law, the President's priorities, and the principles set forth in this Executive order.

(b) *The Office of Management and Budget.* Coordinated review of agency rulemaking is necessary to ensure that regulations are consistent with applicable law, the President's priorities, and the principles set forth in this Executive order, and that decisions made by one agency do not conflict with the policies or actions taken or planned by another agency. The Office of Management and Budget (OMB) shall carry out that review function. Within OMB, the Office of Information and Regulatory Affairs (OIRA) is the repository of expertise concerning regulatory issues, including methodologies and procedures that affect more than one agency, this Executive order, and the President's regulatory policies. To the extent permitted by law, OMB shall provide guidance to agencies and assist the President, the Vice President, and other regulatory policy advisors to the President in regulatory planning and shall be the entity that reviews individual regulations, as provided by this Executive order.

(c) *The Vice President.* The Vice President is the principal advisor to the President on, and shall coordinate the development and presentation of recommendations concerning, regulatory policy, planning, and review, as set forth in this Executive order. In fulfilling their responsibilities under this Executive order, the President and the Vice President shall be assisted by the regulatory policy advisors within the Executive Office of the President and by such agency officials and personnel as the President and the Vice President may, from time to time, consult.

Sec. 3. Definitions. For purposes of this Executive order: (a) "Advisors" refers to such regulatory policy advisors to the President as the President and Vice President may from time to time consult, including, among others: (1) the Director of OMB; (2) the Chair (or another member) of the Council of Economic Advisers; (3) the Assistant to the President for Economic Policy; (4) the Assistant to the President for Domestic Policy; (5) the Assistant to the President for National Security Affairs; (6) the Assistant to the President for Science and Technology; (7) the Assistant to the President for Intergovernmental Affairs; (8) the Assistant to the President and Staff Secretary; (9) the Assistant to the President and Chief of Staff to the Vice President; (10) the Assistant to the President and Counsel to the President; (11) the Deputy Assistant to the President and Director of the White House Office on Environmental Policy; and (12) the Administrator of OIRA, who also shall coordinate communications relating to this Executive order among the agencies, OMB, the other Advisors, and the Office of the Vice President.

(b) "Agency," unless otherwise indicated, means any authority of the United States that is an "agency" under 44 U.S.C. 3502(1), other than those considered to be independent regulatory agencies, as defined in 44 U.S.C. 3502(10).

(c) "Director" means the Director of OMB.

(d) "Regulation" or "rule" means an agency statement of general applicability and future effect, which the agency intends to have the force and effect of law, that is designed to implement, interpret, or prescribe law or policy or to describe the procedure or practice requirements of an agency. It does not, however, include:

- (1) Regulations or rules issued in accordance with the formal rulemaking provisions of 5 U.S.C. 556, 557;
- (2) Regulations or rules that pertain to a military or foreign affairs function of the United States, other than procurement regulations and regulations involving the import or export of non-defense articles and services;
- (3) Regulations or rules that are limited to agency organization, management, or personnel matters; or
- (4) Any other category of regulations exempted by the Administrator of OIRA.

(e) "Regulatory action" means any substantive action by an agency (normally published in the **Federal Register**) that promulgates or is expected to lead to the promulgation of a final rule or regulation, including notices

of inquiry, advance notices of proposed rulemaking, and notices of proposed rulemaking.

(f) "Significant regulatory action" means any regulatory action that is likely to result in a rule that may:

(1) Have an annual effect on the economy of \$100 million or more or adversely affect in a material way the economy, a sector of the economy, productivity, competition, jobs, the environment, public health or safety, or State, local, or tribal governments or communities;

(2) Create a serious inconsistency or otherwise interfere with an action taken or planned by another agency;

(3) Materially alter the budgetary impact of entitlements, grants, user fees, or loan programs or the rights and obligations of recipients thereof; or

(4) Raise novel legal or policy issues arising out of legal mandates, the President's priorities, or the principles set forth in this Executive order.

Sec. 4. Planning Mechanism. In order to have an effective regulatory program, to provide for coordination of regulations, to maximize consultation and the resolution of potential conflicts at an early stage, to involve the public and its State, local, and tribal officials in regulatory planning, and to ensure that new or revised regulations promote the President's priorities and the principles set forth in this Executive order, these procedures shall be followed, to the extent permitted by law:

(a) *Agencies' Policy Meeting.* Early in each year's planning cycle, the Vice President shall convene a meeting of the Advisors and the heads of agencies to seek a common understanding of priorities and to coordinate regulatory efforts to be accomplished in the upcoming year.

(b) *Unified Regulatory Agenda.* For purposes of this subsection, the term "agency" or "agencies" shall also include those considered to be independent regulatory agencies, as defined in 44 U.S.C. 3502(10). Each agency shall prepare an agenda of all regulations under development or review, at a time and in a manner specified by the Administrator of OIRA. The description of each regulatory action shall contain, at a minimum, a regulation identifier number, a brief summary of the action, the legal authority for the action, any legal deadline for the action, and the name and telephone number of a knowledgeable agency official. Agencies may incorporate the information required under 5 U.S.C. 602 and 41 U.S.C. 402 into these agendas.

(c) *The Regulatory Plan.* For purposes of this subsection, the term "agency" or "agencies" shall also include those considered to be independent regulatory agencies, as defined in 44 U.S.C. 3502(10). (1) As part of the Unified Regulatory Agenda, beginning in 1994, each agency shall prepare a Regulatory Plan (Plan) of the most important significant regulatory actions that the agency reasonably expects to issue in proposed or final form in that fiscal year or thereafter. The Plan shall be approved personally by the agency head and shall contain at a minimum:

(A) A statement of the agency's regulatory objectives and priorities and how they relate to the President's priorities;

(B) A summary of each planned significant regulatory action including, to the extent possible, alternatives to be considered and preliminary estimates of the anticipated costs and benefits;

(C) A summary of the legal basis for each such action, including whether any aspect of the action is required by statute or court order;

(D) A statement of the need for each such action and, if applicable, how the action will reduce risks to public health, safety, or the environment, as well as how the magnitude of the risk addressed by the action relates to other risks within the jurisdiction of the agency;

(E) The agency's schedule for action, including a statement of any applicable statutory or judicial deadlines; and

(F) The name, address, and telephone number of a person the public may contact for additional information about the planned regulatory action.

(2) Each agency shall forward its Plan to OIRA by June 1st of each year.

(3) Within 10 calendar days after OIRA has received an agency's Plan, OIRA shall circulate it to other affected agencies, the Advisors, and the Vice President.

(4) An agency head who believes that a planned regulatory action of another agency may conflict with its own policy or action taken or planned shall promptly notify, in writing, the Administrator of OIRA, who shall forward that communication to the issuing agency, the Advisors, and the Vice President.

(5) If the Administrator of OIRA believes that a planned regulatory action of an agency may be inconsistent with the President's priorities or the principles set forth in this Executive order or may be in conflict with any policy or action taken or planned by another agency, the Administrator of OIRA shall promptly notify, in writing, the affected agencies, the Advisors, and the Vice President.

(6) The Vice President, with the Advisors' assistance, may consult with the heads of agencies with respect to their Plans and, in appropriate instances, request further consideration or inter-agency coordination.

(7) The Plans developed by the issuing agency shall be published annually in the October publication of the Unified Regulatory Agenda. This publication shall be made available to the Congress; State, local, and tribal governments; and the public. Any views on any aspect of any agency Plan, including whether any planned regulatory action might conflict with any other planned or existing regulation, impose any unintended consequences on the public, or confer any unclaimed benefits on the public, should be directed to the issuing agency, with a copy to OIRA.

(d) *Regulatory Working Group.* Within 30 days of the date of this Executive order, the Administrator of OIRA shall convene a Regulatory Working Group ("Working Group"), which shall consist of representatives of the heads of each agency that the Administrator determines to have significant domestic regulatory responsibility, the Advisors, and the Vice President. The Administrator of OIRA shall chair the Working Group and shall periodically advise the Vice President on the activities of the Working Group. The Working Group shall serve as a forum to assist agencies in identifying and analyzing important regulatory issues (including, among others (1) the development of innovative regulatory techniques, (2) the methods, efficacy, and utility of comparative risk assessment in regulatory decision-making, and (3) the development of short forms and other streamlined regulatory approaches for small businesses and other entities). The Working Group shall meet at least quarterly and may meet as a whole or in subgroups of agencies with an interest in particular issues or subject areas. To inform its discussions, the Working Group may commission analytical studies and reports by OIRA, the Administrative Conference of the United States, or any other agency.

(e) *Conferences.* The Administrator of OIRA shall meet quarterly with representatives of State, local, and tribal governments to identify both existing and proposed regulations that may uniquely or significantly affect those governmental entities. The Administrator of OIRA shall also convene, from time to time, conferences with representatives of businesses, nongovernmental organizations, and the public to discuss regulatory issues of common concern.

Sec. 5. Existing Regulations. In order to reduce the regulatory burden on the American people, their families, their communities, their State, local, and tribal governments, and their industries; to determine whether regulations promulgated by the executive branch of the Federal Government have become unjustified or unnecessary as a result of changed circumstances; to confirm that regulations are both compatible with each other and not

duplicative or inappropriately burdensome in the aggregate; to ensure that all regulations are consistent with the President's priorities and the principles set forth in this Executive order, within applicable law; and to otherwise improve the effectiveness of existing regulations: (a) Within 90 days of the date of this Executive order, each agency shall submit to OIRA a program, consistent with its resources and regulatory priorities, under which the agency will periodically review its existing significant regulations to determine whether any such regulations should be modified or eliminated so as to make the agency's regulatory program more effective in achieving the regulatory objectives, less burdensome, or in greater alignment with the President's priorities and the principles set forth in this Executive order. Any significant regulations selected for review shall be included in the agency's annual Plan. The agency shall also identify any legislative mandates that require the agency to promulgate or continue to impose regulations that the agency believes are unnecessary or outdated by reason of changed circumstances.

(b) The Administrator of OIRA shall work with the Regulatory Working Group and other interested entities to pursue the objectives of this section. State, local, and tribal governments are specifically encouraged to assist in the identification of regulations that impose significant or unique burdens on those governmental entities and that appear to have outlived their justification or be otherwise inconsistent with the public interest.

(c) The Vice President, in consultation with the Advisors, may identify for review by the appropriate agency or agencies other existing regulations of an agency or groups of regulations of more than one agency that affect a particular group, industry, or sector of the economy, or may identify legislative mandates that may be appropriate for reconsideration by the Congress.

Sec. 6. Centralized Review of Regulations. The guidelines set forth below shall apply to all regulatory actions, for both new and existing regulations, by agencies other than those agencies specifically exempted by the Administrator of OIRA:

(a) *Agency Responsibilities.* (1) Each agency shall (consistent with its own rules, regulations, or procedures) provide the public with meaningful participation in the regulatory process. In particular, before issuing a notice of proposed rulemaking, each agency should, where appropriate, seek the involvement of those who are intended to benefit from and those expected to be burdened by any regulation (including, specifically, State, local, and tribal officials). In addition, each agency should afford the public a meaningful opportunity to comment on any proposed regulation, which in most cases should include a comment period of not less than 60 days. Each agency also is directed to explore and, where appropriate, use consensual mechanisms for developing regulations, including negotiated rulemaking.

(2) Within 60 days of the date of this Executive order, each agency head shall designate a Regulatory Policy Officer who shall report to the agency head. The Regulatory Policy Officer shall be involved at each stage of the regulatory process to foster the development of effective, innovative, and least burdensome regulations and to further the principles set forth in this Executive order.

(3) In addition to adhering to its own rules and procedures and to the requirements of the Administrative Procedure Act, the Regulatory Flexibility Act, the Paperwork Reduction Act, and other applicable law, each agency shall develop its regulatory actions in a timely fashion and adhere to the following procedures with respect to a regulatory action:

(A) Each agency shall provide OIRA, at such times and in the manner specified by the Administrator of OIRA, with a list of its planned regulatory actions, indicating those which the agency believes are significant regulatory actions within the meaning of this Executive order. Absent a material change in the development of the planned regulatory action, those not designated as significant will not be subject to review under this section unless, within 10 working days of receipt

of the list, the Administrator of OIRA notifies the agency that OIRA has determined that a planned regulation is a significant regulatory action within the meaning of this Executive order. The Administrator of OIRA may waive review of any planned regulatory action designated by the agency as significant, in which case the agency need not further comply with subsection (a)(3)(B) or subsection (a)(3)(C) of this section.

(B) For each matter identified as, or determined by the Administrator of OIRA to be, a significant regulatory action, the issuing agency shall provide to OIRA:

- (i) The text of the draft regulatory action, together with a reasonably detailed description of the need for the regulatory action and an explanation of how the regulatory action will meet that need; and
- (ii) An assessment of the potential costs and benefits of the regulatory action, including an explanation of the manner in which the regulatory action is consistent with a statutory mandate and, to the extent permitted by law, promotes the President's priorities and avoids undue interference with State, local, and tribal governments in the exercise of their governmental functions.

(C) For those matters identified as, or determined by the Administrator of OIRA to be, a significant regulatory action within the scope of section 3(f)(1), the agency shall also provide to OIRA the following additional information developed as part of the agency's decision-making process (unless prohibited by law):

- (i) An assessment, including the underlying analysis, of benefits anticipated from the regulatory action (such as, but not limited to, the promotion of the efficient functioning of the economy and private markets, the enhancement of health and safety, the protection of the natural environment, and the elimination or reduction of discrimination or bias) together with, to the extent feasible, a quantification of those benefits;
- (ii) An assessment, including the underlying analysis, of costs anticipated from the regulatory action (such as, but not limited to, the direct cost both to the government in administering the regulation and to businesses and others in complying with the regulation, and any adverse effects on the efficient functioning of the economy, private markets (including productivity, employment, and competitiveness), health, safety, and the natural environment), together with, to the extent feasible, a quantification of those costs; and
- (iii) An assessment, including the underlying analysis, of costs and benefits of potentially effective and reasonably feasible alternatives to the planned regulation, identified by the agencies or the public (including improving the current regulation and reasonably viable nonregulatory actions), and an explanation why the planned regulatory action is preferable to the identified potential alternatives.

(D) In emergency situations or when an agency is obligated by law to act more quickly than normal review procedures allow, the agency shall notify OIRA as soon as possible and, to the extent practicable, comply with subsections (a)(3)(B) and (C) of this section. For those regulatory actions that are governed by a statutory or court-imposed deadline, the agency shall, to the extent practicable, schedule rule-making proceedings so as to permit sufficient time for OIRA to conduct its review, as set forth below in subsection (b)(2) through (4) of this section.

(E) After the regulatory action has been published in the **Federal Register** or otherwise issued to the public, the agency shall:

- (i) Make available to the public the information set forth in subsections (a)(3)(B) and (C);
- (ii) Identify for the public, in a complete, clear, and simple manner, the substantive changes between the draft submitted to OIRA for review and the action subsequently announced; and

(iii) Identify for the public those changes in the regulatory action that were made at the suggestion or recommendation of OIRA.

(F) All information provided to the public by the agency shall be in plain, understandable language.

(b) *OIRA Responsibilities.* The Administrator of OIRA shall provide meaningful guidance and oversight so that each agency's regulatory actions are consistent with applicable law, the President's priorities, and the principles set forth in this Executive order and do not conflict with the policies or actions of another agency. OIRA shall, to the extent permitted by law, adhere to the following guidelines:

(1) OIRA may review only actions identified by the agency or by OIRA as significant regulatory actions under subsection (a)(3)(A) of this section.

(2) OIRA shall waive review or notify the agency in writing of the results of its review within the following time periods:

(A) For any notices of inquiry, advance notices of proposed rulemaking, or other preliminary regulatory actions prior to a Notice of Proposed Rulemaking, within 10 working days after the date of submission of the draft action to OIRA;

(B) For all other regulatory actions, within 90 calendar days after the date of submission of the information set forth in subsections (a)(3)(B) and (C) of this section, unless OIRA has previously reviewed this information and, since that review, there has been no material change in the facts and circumstances upon which the regulatory action is based, in which case, OIRA shall complete its review within 45 days; and

(C) The review process may be extended (1) once by no more than 30 calendar days upon the written approval of the Director and (2) at the request of the agency head.

(3) For each regulatory action that the Administrator of OIRA returns to an agency for further consideration of some or all of its provisions, the Administrator of OIRA shall provide the issuing agency a written explanation for such return, setting forth the pertinent provision of this Executive order on which OIRA is relying. If the agency head disagrees with some or all of the bases for the return, the agency head shall so inform the Administrator of OIRA in writing.

(4) Except as otherwise provided by law or required by a Court, in order to ensure greater openness, accessibility, and accountability in the regulatory review process, OIRA shall be governed by the following disclosure requirements:

(A) Only the Administrator of OIRA (or a particular designee) shall receive oral communications initiated by persons not employed by the executive branch of the Federal Government regarding the substance of a regulatory action under OIRA review;

(B) All substantive communications between OIRA personnel and persons not employed by the executive branch of the Federal Government regarding a regulatory action under review shall be governed by the following guidelines: (i) A representative from the issuing agency shall be invited to any meeting between OIRA personnel and such person(s);

(ii) OIRA shall forward to the issuing agency, within 10 working days of receipt of the communication(s), all written communications, regardless of format, between OIRA personnel and any person who is not employed by the executive branch of the Federal Government, and the dates and names of individuals involved in all substantive oral communications (including meetings to which an agency representative was invited, but did not attend, and telephone conversations between OIRA personnel and any such persons); and

(iii) OIRA shall publicly disclose relevant information about such communication(s), as set forth below in subsection (b)(4)(C) of this section.

(C) OIRA shall maintain a publicly available log that shall contain, at a minimum, the following information pertinent to regulatory actions under review:

- (i) The status of all regulatory actions, including if (and if so, when and by whom) Vice Presidential and Presidential consideration was requested;
- (ii) A notation of all written communications forwarded to an issuing agency under subsection (b)(4)(B)(ii) of this section; and
- (iii) The dates and names of individuals involved in all substantive oral communications, including meetings and telephone conversations, between OIRA personnel and any person not employed by the executive branch of the Federal Government, and the subject matter discussed during such communications.

(D) After the regulatory action has been published in the **Federal Register** or otherwise issued to the public, or after the agency has announced its decision not to publish or issue the regulatory action, OIRA shall make available to the public all documents exchanged between OIRA and the agency during the review by OIRA under this section.

(5) All information provided to the public by OIRA shall be in plain, understandable language.

Sec. 7. Resolution of Conflicts. To the extent permitted by law, disagreements or conflicts between or among agency heads or between OMB and any agency that cannot be resolved by the Administrator of OIRA shall be resolved by the President, or by the Vice President acting at the request of the President, with the relevant agency head (and, as appropriate, other interested government officials). Vice Presidential and Presidential consideration of such disagreements may be initiated only by the Director, by the head of the issuing agency, or by the head of an agency that has a significant interest in the regulatory action at issue. Such review will not be undertaken at the request of other persons, entities, or their agents.

Resolution of such conflicts shall be informed by recommendations developed by the Vice President, after consultation with the Advisors (and other executive branch officials or personnel whose responsibilities to the President include the subject matter at issue). The development of these recommendations shall be concluded within 60 days after review has been requested.

During the Vice Presidential and Presidential review period, communications with any person not employed by the Federal Government relating to the substance of the regulatory action under review and directed to the Advisors or their staffs or to the staff of the Vice President shall be in writing and shall be forwarded by the recipient to the affected agency(ies) for inclusion in the public docket(s). When the communication is not in writing, such Advisors or staff members shall inform the outside party that the matter is under review and that any comments should be submitted in writing.

At the end of this review process, the President, or the Vice President acting at the request of the President, shall notify the affected agency and the Administrator of OIRA of the President's decision with respect to the matter.


Sec. 8. Publication. Except to the extent required by law, an agency shall not publish in the **Federal Register** or otherwise issue to the public any regulatory action that is subject to review under section 6 of this Executive order until (1) the Administrator of OIRA notifies the agency that OIRA has waived its review of the action or has completed its review without any requests for further consideration, or (2) the applicable time period in section 6(b)(2) expires without OIRA having notified the agency that it is returning the regulatory action for further consideration under section 6(b)(3), whichever occurs first. If the terms of the preceding sentence have not been satisfied and an agency wants to publish or otherwise issue a

regulatory action, the head of that agency may request Presidential consideration through the Vice President, as provided under section 7 of this order. Upon receipt of this request, the Vice President shall notify OIRA and the Advisors. The guidelines and time period set forth in section 7 shall apply to the publication of regulatory actions for which Presidential consideration has been sought.

Sec. 9. Agency Authority. Nothing in this order shall be construed as displacing the agencies' authority or responsibilities, as authorized by law.

Sec. 10. Judicial Review. Nothing in this Executive order shall affect any otherwise available judicial review of agency action. This Executive order is intended only to improve the internal management of the Federal Government and does not create any right or benefit, substantive or procedural, enforceable at law or equity by a party against the United States, its agencies or instrumentalities, its officers or employees, or any other person.

Sec. 11. Revocations. Executive Orders Nos. 12291 and 12498; all amendments to those Executive orders; all guidelines issued under those orders; and any exemptions from those orders heretofore granted for any category of rule are revoked.

A handwritten signature in black ink, reading "William Clinton". The signature is written in a cursive, flowing style with a large, prominent "W" and "C".

THE WHITE HOUSE,
September 30, 1993.